

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
NEW ALBANY DIVISION

In re:) Chapter 11
)
EASTERN LIVESTOCK CO., LLC,) Case No. 10-93904-BHL-11
)
Debtor.)

**MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO
TRUSTEE'S OBJECTION TO CLAIM 475 FILED BY MARK FREEMAN III
AND NOTICE OF RESPONSE DEADLINE**

James A. Knauer, the chapter 11 trustee appointed in this case ("Trustee"), respectfully requests that the Court grant a thirty (30) day extension of time for Mark Freeman III ("Mr. Freeman") to file a response to the *Trustee's Objection To Claim 475 Filed By Mark Freeman III And Notice Of Response Deadline* (the "Objection") (Docket No. 2104). In support, the Trustee states as follows:

1. The Trustee filed his Objection on April 19, 2013.
2. Mr. Freeman's deadline to file a response to the Objection is currently May 20, 2013, which time has not yet expired.
3. Mr. Freeman requires additional time to file a response to the Objection.
4. Mr. Freeman's counsel has been in contact with Dustin R. DeNeal, counsel for the Trustee.
5. Mr. DeNeal has agreed without objection to a thirty (30) day extension of time for Mr. Freeman to file his response to the Objection.
6. Mr. Freeman's counsel is not admitted to practice before this Court. As a result, Mr. DeNeal has agreed to electronically file this motion.

WHEREFORE, the Trustee respectfully requests that the Court grant Mr. Freeman a thirty (30) day extension of time, to and including June 19, 2013, to file a response to the Trustee's Objection and further requests all other just and appropriate relief.

Respectfully submitted,

FAEGRE BAKER DANIELS LLP

By: /s/ Dustin R. DeNeal

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CERTIFICATE OF SERVICE

I hereby certify that on May 14, 2013, a copy of the foregoing pleading was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system.

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I further certify that on May 14, 2013, a copy of the foregoing pleading was mailed by first-class U.S. Mail, postage prepaid and properly addressed, to the following:

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